UNITED STATES BANKRUPTCY COURT EASTERN DISTRICT OF MISSOURI EASTERN DIVISION

In re:)	
IRON COUNTY HOSPITAL DISTRICT d/b/a Iron County Medical Center, a political subdivision of the State of Missouri,))))	Case No. 18 - 10 111 Chapter 9 proceedings
Debtor.)	

MOTION FOR ORDER ESTABLISHING DEADLINE TO FILE OBJECTIONS TO CHAPTER 9 PETITION

Iron County Hospital District d/b/a Iron County Medical Center (the "Debtor"), pursuant to 11 U.S.C. § 921(c), for its Motion, states:

JURISDICTION AND VENUE

- 1. The Debtor filed its voluntary petition for relief under Chapter 9 of Title 11 of the United States Code (the "Bankruptcy Code") on February 21, 2018 (the "Petition).
- 2. This Court has jurisdiction pursuant to 28 U.S.C §§ 1334 and 157(b). Venue is proper pursuant to 28 U.S.C. § 1409(a).

MOTION TO ESTABLISH DEADLINE TO FILE OBJECTIONS TO PETITION

- 3. Section 921(c) provides that any objections of the filing of the Petition as lacking good faith or failing to meet the requirements of Chapter 9 shall be considered by the Court after notice adequate under the circumstances and an opportunity for a hearing. *See also* 11 U.S.C. § 102(1) (construing "after notice and hearing").
- 4. This Court must order relief if it does not dismiss the Petition. 11 U.S.C. § 921(d). A dismissal under section 921(c) requires, among other things, an objection to the petition.

Case 18-10111 Doc 4 Filed 02/21/18 Entered 02/21/18 15:00:43 Main Document Pg 2 of 2

- 5. To expedite the entry of an order for relief, the Debtor respectfully requests the Court set **April 2, 2018**, as the deadline for filing objections to the Petition.
- 11. The proposed Notice, attached as **Exhibit A**, provides for notice of the deadline for filing objections to the Petition. It provides that if no objection to the Petition is timely filed that the relief will be ordered.

WHEREFORE, the Iron County Hospital District requests that this Court enter an Order establishing April 2, 2018, as the deadline for objecting to the Petition; approving the attached Notice of the deadline; and providing such other and further relief as is just and proper.

Dated: February 21, 2018.

Respectfully submitted,

/s/ Daniel D. Doyle

Daniel D. Doyle

36724MO

Scott A. Pummell 66164MO Frederike K. Winslow 69831MO

LASHLY & BAER, P.C.

714 Locust Street

St. Louis, Missouri 63101

Telephone: (314) 621-2939

Facsimile: (314) 621-6844

ddoyle@lashlybaer.com

spummell@lashlybaer.com

fwinslow@lashlybaer.com

Attorneys for Debtor Iron County Hospital District d/b/a Iron County Medical Center